

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

UNITED STATES OF AMERICA,

v.

BHAGAVAN MAHAMAYAVI ANTLE, et al.

Defendants.

CR NO. 4:22-CR-580-JD

**DEFENDANT CHARLIE
SAMMUT'S MOTION FOR
CONTINUANCE**

The defendant, Charlie Sammut ("Sammut"), by and through his undersigned counsel, hereby respectfully submits this Motion for Continuance.

On June 29, 2022, the Indictment was returned in this case. The Indictment contains allegations against Sammut involving violations of the Lacey Act and the Endangered Species Act, in addition to a Lacey Act forfeiture count.

On July 14, 2022, the undersigned counsel for Sammut first entered an appearance.

On July 22, 2022, the court scheduled this case for a pretrial conference on August 30, 2022, and jury selection on September 13, 2022.

On July 18, 2022, Sammut filed a First Motion for Discovery and Inspection, and the following day received a voluminous discovery production from the government. Defense counsel will have to undertake a painstaking review and analysis of all the documents and underlying transactions. Defense counsel also anticipates the need to conduct further investigation and possibly file additional discovery motions following review of the government's initial discovery production.

Sammut requires a continuance to receive, review, and analyze the discovery materials, adequately investigate the case, interview witnesses, research legal issues, and adequately prepare a defense. Therefore, Sammut respectfully requests that the currently scheduled pretrial conference and jury selection be continued to the following term of court.

Defendant Charlie Sammut understands and has agreed that this request for a continuance waives his right to a speedy trial.

The undersigned has consulted with AUSA Derek A. Shoemake who has no objection to a continuance.

Based on the foregoing, the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to Title 18, United States code, Section 3161(h)(7)(A) and (B).

Respectfully submitted,

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August 3, 2022
Charleston, South Carolina